UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
999 18TH STREET- SUITE 300
DENVER, CO 80202-2466
Phone 800-227-8917
http://www.epa.gov/region08

Ref: EPR-ER

I. HEADING

Date:	**May 9, 2005**
Site Name:	**Libby Asbestos Site (Stimson – OU5)**
From:	**Craig Myers, OSC**
To:	Eugene Lee, EPA Headquarters
POLREP No.:	**#10 for Libby Asbestos, initial POLREP for Former Stimson Central Maintenance Building**

II. BACKGROUND

Site No.:	BC
Response Authority:	CERCLA
CERCLIS No:	MT0009083840
NPL Status:	Added to NPL: 10/23/02
Action Memorandum Status:	Approved 5/23/00
Action Memorandum Amendment:	08/13/01
Action Memorandum Amendment:	05/09/02
Start Date (Stimson Property) Fund - Lead:	**05/03/05**

III. SITE INFORMATION

A. Incident Category

Fund-Lead, Time Critical Removal Action

B. Site Description

The Libby Asbestos Site includes an inactive vermiculite mine located in northwestern Montana. Vermiculite mining at Zonolite Mountain (the "mine") was commenced by the Universal Zonolite Company in the 1920s. In 1963, W.R. Grace acquired the property and continued operations until September, 1990.

The processed ore was trucked down the Rainy Creek Road to a Screening Plant, which separated the milled ore into several sizes. Subsequently, the screened ore was moved by conveyor belt across the Kootenai River and shipped either to the Export/Expansion Plant in Libby for further processing or across the country by rail.

This POLREP details only a portion of OU 05 - the "Former Stimson Central Maintenance Building" (CMB). The Stimson property housed vermiculite processing operations until 1950. After that, the Stimson Lumber Mill began producing plywood and dimensioned lumber, continuing to do so until 2002. Buildings around the property contain varying amounts of vermiculite. The property is now owned and operated by the Lincoln County Port Authority, a non-profit portion of the county government that was established to coordinate and oversee economic redevelopment in Libby.

1. **Site Location**

The Stimson Property is located off Highway 2, just south of Libby, MT. Libby is within Sections 3 and 10, T.30N, R.31W of the Libby Quadrangle in Lincoln County, MT.

2. **Description of Threat**

The ore body from which the vermiculite ore was mined contains significant occurrences of amphibole asbestos. Processing of the vermiculite ore, with amphibole asbestos intermixed, caused high dust and airborne releases of asbestos fibers. The release of these fibers into the air makes them available for inhalation and completes the human exposure pathway. These asbestiform fibers have been linked to certain kinds of lung disease and abnormalities. Medical screening completed in Libby showed lung abnormalities among Grace mine workers, as well as people beyond Grace workers and their families, who came into "recreational" contact with the fibers.

The Acting Assistant Administrator, Office of Solid Waste and Emergency Response has determined that the presence of the asbestos at the Site may present an imminent and substantial endangerment in the Action Memorandum.

C. <u>Preliminary Assessment/Site Inspection Results</u>

Within the CMB, three distinct areas have been identified that have Vermiculite Containing Insulation (VCI) or other asbestos-containing building materials that are causing a human health threat or threatening a release to the environment; these areas are the Midline Wall (believed to have once been an exterior wall), the former Mobile Shop, and the former Mobile Shop roof. VCI has been observed leaking from all sections of the Midline Wall, and all walls of the Former Mobile

Shop. The Former Mobile Shop roof was constructed of a tongue and groove decking material and covered with a light concrete type material. EPA believes that vermiculite was mixed in with this concrete as aggregate. The concrete was sampled and tested out at less than 1% Libby Amphibole; however, the concrete material is damaged to the point that it cannot be repaired. Future removal or repair, due to the structure's age rather than contamination, will threaten the remedy planned for the interior of the mobile shop.

Portions of the lower roof areas are of similar construction as the former Mobile Shop roof, but are undamaged. Future removal or repair will not pose a threat to the remedy inside the building.

IV. RESPONSE INFORMATION

A. Response Actions

Currently, EPA is removing VCI from former exterior walls of the Central Maintenance Building. We are currently only working on the Midline Wall in the former Engineering and Warehouse (E & W) spaces. The decision to remove the insulation was made because portions of the building are presently occupied and VCI is leaking from the walls into both occupied spaces in the building as well as onto the ground outside. Additional spaces in the building are going to be leased out soon, and may be utilizing the overhead gantry cranes. EPA believes that this will cause more VCI to leak from the walls. EPA is also concerned that the industrial nature of the property will lead to higher than normal breaches of the wall cavities by utility workers, causing small releases each time. Due to the building's structure, architecture, and proposed future use, there is no effective way to contain the VCI in the walls.

B. Enforcement

This is a fund-lead action. Most, if not all, of the activities are associated with VCI, and therefore may not be cost recoverable.

C. Future Actions

Similar actions will take place in the Former Mobile Shop area, and the Former Mobile Shop roof will be removed and replaced with a suitable roofing material. Minor structural repairs may be necessary once removal of the concrete material is complete. These repairs will be done by the Lincoln County Port Authority.

V. COST INFORMATION

Costs to date:

ERRS:	**$ 188,248**
CDM:	**$ 2,000**
USCG:	**$ 6,000**

VI. DISPOSITION OF WASTES

Approximately 50 cubic yards of waste have been taken to the Lincoln County Asbestos Landfill to date. This figure includes 40 cubic yards of VCI removed from walls and approximately 10 cubic yards of used PPE and materials used in constructing containments. Projected volume of waste is 1,000 cubic yards.